

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS MOTION IN  
LIMINE NO. 17**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal information in its September 16, 2017 Motion *in Limine No. 17* and exhibits in support of the same (the “Administrative Motion” or “Waymo’s Motion”), as well as Defendants’ Response to the same and exhibits in support of the same. The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Motion in Limine No. 17 (“Waymo’s Motion”)	Portions highlighted in green; portions highlighted in blue	Waymo; Defendants
Exhibit 1 to Waymo’s Motion	Entire Document	Waymo and/or Defendants
Exhibit 2 to Waymo’s Motion	Entire Document	Waymo and/or Defendants
Exhibit 3 to Waymo’s Motion	Portions highlighted in green; portions highlighted in blue	Waymo; Defendants
Portions of Uber’s Opposition to Waymo’s Motion in Limine No. 17 (“Uber’s Opposition”)	Portions highlighted in blue	Defendants
Exhibit 50 of Uber’s Opposition	Entire Document	Waymo and/or Defendants
Exhibit 52 of Uber’s Opposition	Entire Document	Waymo and/or Defendants

3. Waymo seeks to seal the portions of Waymo’s Motion in Limine No. 17, Exhibits 1-3, Defendants’ Opposition and Exhibits 50 and 52 because Defendants have designated the information confidential and/or highly confidential. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules.

4. Waymo's Motion also contains or refers to trade secret and confidential business information, which Waymo seeks to seal. Specifically, portions of Waymo's Motion in Limine No. 17, Exhibits 1-3, Defendants' Opposition and Exhibits 50 and 52 identified by Waymo in the table above contain Waymo's trade secrets and confidential business information. The documents and highlighted portions listed above describe proprietary information gathered from technical leads across the entire self-driving program, including descriptions and names of software, company goals for its technical development, specific technical design goals, and identification of risks. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors access to in-depth descriptions—and analysis—of the functionality of Waymo's autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed. Waymo's request to seal is narrowly tailored to only the confidential information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on September 13, 2017.

By /s/ Lindsay Cooper  
Lindsay Cooper  
Attorneys for WAYMO LLC

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven